



State of New Jersey
DEPARTMENT OF COMMUNITY AFFAIRS
OFFICE OF SMART GROWTH
PO Box 204
TRENTON NJ 08625-0204

JON S. CORZINE
Governor

SUSAN BASS LEVIN
Commissioner

EILEEN SWAN
Executive Director

October 26, 2006

Robert Clark, Director
Monmouth County Planning Board
Hall of Records Annex
One East Main Street
Freehold, NJ 07728

RE: Western Monmouth Development Plan Petition for Initial Plan Endorsement

Dear Mr. Clark:

Pursuant to N.J.A.C. 5:85 7.5(f), in a letter dated June 27, 2006, the Office of Smart Growth (OSG) requested that Monmouth County submit additional information, in order to assist with the evaluation of the County's Western Monmouth Development Plan (WMDP) petition for Initial Plan Endorsement for consistency with the State Development and Redevelopment Plan (State Plan). The County submitted an initial response to this request dated August 25, 2006. The Office of Smart Growth has reviewed the County's response to this request for additional information, however, many of our initial concerns remain.

The Office of Smart Growth recognizes the extent of comprehensive planning and public participation process that went into the formulation of the WMDP. The Plan is truly a fine example of inter-municipal cooperation and regional planning, and we appreciate all of the work that has been undertaken within this region of the county, as well as that which is ongoing within other regions of the county.

However, after review of the petition by the Office of Smart Growth in cooperation with our state agency partners, our office cannot recommend that the WMDP be endorsed by the State Planning Commission at this time, for the following reasons:

- Potable water supply: Water supply in the Western Monmouth region remains a concern. Based on the information available to us, there appears to be a disparity between the availability of potable water and the pace at which growth has been occurring within the region. The County must work with DEP to ensure adequate public water supply for current and anticipated growth and agree to work with and provide direction to the constituent municipalities to implement planning and zoning ordinances to match available and anticipated public water supply capacities.
- Wastewater management: The county-wide wastewater management plan must be brought into consistency with the State Development and Redevelopment Plan (State Plan), specifically with regard to regional growth projections, infrastructure needs, and conservation goals. The County needs to update its Wastewater Management Plan to exclude environmentally sensitive planning



areas and other areas not proposed for growth before the WMDP will be eligible for Initial Plan Endorsement.

- Centers: As the constituent municipalities in the WMDP are not currently seeking municipal plan endorsement, the Plan should exclude a specific delineation of center boundaries, as is currently contained in the WMDP. However, it is appropriate for a regional plan to identify the general vicinity and location of proposed centers. We suggest that the boundaries of proposed centers be identified on the map through the use of circles that identify the general vicinity of these proposed centers and clearly indicate that these circles do not demarcate actual center boundary lines.

In addition, OSG continues to be concerned about the commitment of some of the municipalities in the region to mixed-use, center-based development. In particular, OSG received a letter from Manalapan Township's planner, dated July 20, 2006, that describes Manalapan's opposition to mixed-use, center-based development. This is troubling as such development is the cornerstone of the principles of smart growth and the State Plan.

- Transportation Issues: Existing development in the Western Monmouth study area has exceeded the current capacity of the transportation infrastructure. Future movement of people and freight is a major issue. Widening of Route 9 is not a viable option. The construction of the Monmouth-Ocean-Middlesex (MOM) passenger rail line is not a certainty and, if approved and constructed, will still not be an available resource for a number of years. Coordination of land use and transportation and planning for that plan is essential.
- Activity areas/Non-statutorily defined Redevelopment areas: "activity areas" are not a recognized construct within the State Plan; nor are the "Redevelopment Areas" as identified in the WMDP. As described in the WMDP, Activity Areas and perhaps Redevelopment Areas could conceivably fit into State Plan constructs as either small centers (e.g., hamlets or villages), or as the cores of larger centers. However, without additional detail as to what precisely each activity area will be in terms of concepts recognized in the State Plan, and how it will relate to its surroundings, OSG cannot recommend endorsing a plan which identifies site-specific Activity Areas or non-statutorily defined Redevelopment Areas.

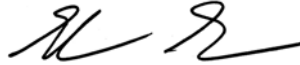
The Western Monmouth study area faces a number of planning challenges that result from the pressures of past growth combined with limitations on available resources and infrastructure. Primarily these limitations are focused on wastewater treatment capacity and available water supply. However, additional problems stem from a strained and limited transportation system and the lack of a common approach to planning among the region's municipalities. These issues are best addressed at the regional level and we are confident that you can adequately and appropriately deal with them in your plan.

At a minimum, the WMDP should clearly acknowledge the constraints that the region is facing. The plan should focus on the restrictions and suggest strategies for dealing with them at a regional level. The regional plan should also contain a discussion of the limitations that the region's municipalities will face and must adequately deal with through local planning as a result of these conditions. Further, the plan should recognize that absent a significant change of circumstance, all future development must take place within the limits that these constraints pose.

OSG would like to continue working with Monmouth County to achieve Plan Endorsement for this region. Therefore, pursuant to N.J.A.C. 5:85-7.5 (f), I would like to provide Monmouth County an extension of 30 days in order for OSG to schedule a meeting with the Monmouth County Planning Board and state agencies, including representatives from OSG, DEP, and DOT, to address the outstanding consistency issues that are preventing Plan Endorsement for the region and to discuss specific strategies that are available for the County to revise its Plan. We will work with you to provide clear direction on how Plan Endorsement can be achieved.

Thank you for your participation and dedication to the Plan Endorsement process. Please know that OSG and the state agencies are committed to helping the County to achieve Plan Endorsement for the WMDP. Should you have any questions or concerns, please contact Russel Like, Area Planner for Monmouth County, at (609) 292-6350 or via email at Russel.Like@dca.state.nj.us.

Sincerely,

A handwritten signature in black ink, appearing to be 'Eileen Swan', written in a cursive style.

Eileen Swan
Executive Director

ES:jid:dds

c: Bonnie Goldschlag, Assistant Director, Monmouth County Planning Board
Ed Sampson, Supervising Planner, Monmouth County Planning Board
Joseph I. Donald, Deputy Executive Director, OSG
Benjamin Spinelli, Policy Director, OSG
Russel Like, Area Planner, OSG
State agency representatives *via email*